

REMARKS

The non-final Office Action mailed August 19, 2005 has been received and reviewed. Applicants have amended the specification to correct inconsistencies in terminology in the specification. Specifically, the references to “blade mount assembly” have been changed to “plow mount assembly”. In addition, all references to “frame mount assembly” that referred to the complete snowplow assembly have been changed to “snowplow mount assembly”. Furthermore, all reference to “lift mount” have been changed to “lift mount assembly”. In addition, all references to “housing mount assembly” have been changed to “frame mount assembly”. Applicants submit that the amendments do not constitute new matter. Applicants have also amended claims 88, 100, 101, 114, 144 and 145.

I. OVERVIEW OF THE INVENTION AND CLAIMS

A review of the Examiner’s rejection and the labeling of the components of Figure 7 of Malinowski and Figure 1 of Behrens by the Examiner indicates that the Examiner may still be confused regarding the structure and function of the components of the snowplow blade mount defined in the claims. Applicants had hoped that the explanation set forth in the Fourth Amendment filed on June 9, 2005 would resolve this apparent confusion. Applicants have amended the Specification to address several formal errors regarding the use of inconsistent terminology. Applicants submit that these amendments will facilitate in clarifying the structures that are defined in the claims. Applicants have again presented below an overview of the claimed invention in an effort to distinguish the snowplow mount assembly defined in the claims from other types of units disclosed in the cited art of record.

A. The Snowplow Mount Assembly Defined in Independent Claims 88 and 114

Independent claims 88 and 114 defined four principal components of the snowplow blade mount, namely 1) the frame mount assembly, 2) the support mount assembly, 3) the lift mount assembly, and 4) the plow mount assembly. A fifth component, namely the snowplow blade is connectable to one end of the plow mount assembly. Each of these components have a different function and defined placement relationship relative to one another as set forth in the claims.

B. The Frame Mount Assembly

The frame mount assembly is designed to be **substantially non-detachably mountable to a frame at a front portion of a vehicle**. The frame mount assembly is also designed to be mounted in a certain position on the vehicle, namely the **front portion of the vehicle**. The frame mount assembly is connected to the frame of the vehicle such that **no portion of the frame mount assembly 1) connects to the front bumper of the vehicle, 2) extends beyond the front bumper, and 3) connects to the sides of the vehicle**. The frame mount assembly is also designed such that at least a majority of the components of the frame mount assembly **are portioned below the front bumper**. (See Figs. 1, 8, 11-13; page 18, lns. 15-19). One non-limiting embodiment of the frame mount assembly 200 is illustrated in Figures 1-5 and 8; and another non-limiting embodiment of the frame mount assembly 500 is illustrated in Figures 11-16.

The frame mount assembly includes a connection arrangement that is designed to detachably connect to the support mount assembly and fully secure the support mount assembly to the frame mount assembly. A majority of the connection arrangement is positioned below the bottom level of the front bumper of the vehicle when the frame mount assembly is mounted to the vehicle. The connection arrangement includes a plurality of connectors that connect the support mount assembly to the frame mount assembly. The connection arrangement also includes at least one engagement arrangement that receives at least a part of a front portion of the support mount assembly and at least

partially limits movement of the support mount assembly relative to the frame mount assembly when the support mount assembly is secured by the connection arrangement. At least one of the connectors is spaced forwardly from the engagement arrangement.

One non-limiting embodiment of the support mount assembly that can detachably connect to frame mount assembly 200 corresponds to support assembly 250 that is best illustrated in Figures 1-4 and 9. A non-limiting example of one type of connection arrangement on frame mount assembly 200 is shown in Figure 8 and identified by structures 230 and/or 232. A non-limiting example of one type of engagement arrangement on the frame mount assembly is shown in Figure 8 as structures 220, 222 and/or 224. As illustrated in Figure 8, connection arrangement 232 is portioned forwardly of the components of the engagement arrangement represented by structures 220, 222 and/or 224. As illustrated in Figures 1-4, the connection arrangement and the engagement arrangement are positioned below and behind the front surface of the bumper of the vehicle when the frame mount assembly is connected to the vehicle. As illustrated in Figures 1 and 2, the connection arrangement and engagement arrangement of the frame mount assembly fully secure the support mount assembly to the frame mount assembly.

Another non-limiting embodiment of a support mount assembly that can connect to frame mount assembly 500 corresponds to support assembly 600 that is best illustrated in Figures 11-15. A non-limiting example of one type of connection arrangement on frame mount assembly 500 is shown in Figure 16 and identified by structures 570 and/or 572. A non-limiting example of one type of engagement arrangement on the frame mount assembly is shown in Figure 11 as structures 560, 562 and/or 564. As illustrated in Figure 11, connection arrangement 572 is portioned forwardly of the components of the engagement arrangement represented by structures 560, 562 and/or 564. As illustrated in Figures 11-13, the connection arrangement and the engagement arrangement are

positioned below and behind the front surface of the bumper of the vehicle when the frame mount assembly is connected to the vehicle. As illustrated in Figures 11 and 12, the connection arrangement and engagement arrangement of the frame mount assembly fully secure the support mount assembly to the frame mount assembly.

C. The Support Mount Assembly

The support mount assembly is designed to be detachably connectable to the frame mount assembly and the plow mount assembly. The support mount assembly is also designed to at least partially support the lift mount assembly. As stated above, the support mount assembly corresponds to support assembly 250 and 600 as best illustrated in Figures 1-5, 9, 11-15 and 19.

D. The Lift Mount Assembly

The lift mount assembly is designed to at least partially lift at least a portion of the plow mount assembly. The lift mount assembly is at least partially supported on the support mount assembly. One non-limiting lift mount assembly corresponds to lift mount assembly 310 as best illustrated in Figures 1-4 and 9. Another non-limiting lift mount assembly corresponds to lift mount assembly 900 as best illustrated in Figures 11-13 and 19.

E. The Plow Mount Assembly

The plow mount assembly is designed to be 1) detachably connected to the support mount assembly at one end and 2) connected to a snowplow blade at the other end. The plow mount assembly is also designed to be pivotally connectable to the support mount assembly. Independent claim 88 also requires the plow mount assembly to be design so that when the plow mount assembly is connected to the support mount assembly, the plow mount assembly is **spaced from and not engaged with** the frame mount assembly, thus does not connect or engage the frame mount assembly. This arrangement is best illustrated in Figures 1 and 11. The plow mount assembly is also

detachably connectable to the support mount assembly in a manner that allows the plow mount assembly to be fully disconnected from the support mount assembly without having to partially or fully disconnect the support mount assembly from the frame mount assembly. This arrangement is best illustrated in Figures 2 and 12.

One non-limiting embodiment of the plow mount assembly is illustrated in Figures 1-4, 6, 7 and 10. As illustrated in Figure 10, plow mount assembly 40 includes components 64, 66, 68 and 70 that are used to connect the snowplow blade 41 to one end of the plow mount assembly. Plow mount assembly 40 also includes components 52 and 54 that enable the plow mount assembly to be pivotally and detachably connected to the support mount assembly by components 282 and 290 of support mount assembly 250. When pin 290 is removed from pin housing 282, plow mount assembly 40 disconnects from the support mount assembly. This disconnection of the plow mount assembly from the support mount assembly can be achieved without having to remove pins 290 from pin housings 280 and 284 that are used to secure the support mount assembly to the frame mount assembly.

Another non-limiting embodiment of the plow mount assembly is illustrated in Figures 11-14 and 20. As illustrated in Figure 20, plow mount assembly 700 includes components 780, 782, 784 and 786 that are used to connect the snowplow blade 710 to one end of the plow mount assembly. Plow mount assembly 700 also includes components 754 and 756 that enable the plow mount assembly to be pivotally and detachably connected to the support mount assembly 600 by components 642 and 652 of support mount assembly 600. When pin 652 is removed from pin housing 642, plow mount assembly 700 disconnects from the support mount assembly 600. This disconnection of the plow mount assembly from the support mount assembly can be achieved without having to remove pins 652 from pin housings 640 and 644 that are used to secure the support

mount assembly to the frame mount assembly.

F. The Snowplow Blade

The snowplow blade is connected to one end of the plow mount assembly. One non-limiting embodiment of the snowplow blade is the snowplow blade 41 as best illustrated in Figures 1-4. Another non-limiting embodiment of the snowplow blade is the snowplow blade 710 as best illustrated in Figures 11-13.

II. THE SECTION 102 REJECTIONS

The Examiner rejected claims 88-95, 100-104, 106, 114, 115, 117-119, 124, 133, 137 and 140 under 35 U.S.C. 102(e) as being anticipated by Malinowski. The Examiner also rejected claims 88-95, 100-105, 107, 108, 112, 114, 115, 117-119, 124, 133, 137 and 140 under 35 U.S.C. 102(e) as being anticipated by Behrens. Applicants submit that the pending claims are not anticipated by any of the cited art of record.

A. The Anticipation Rejection Based on Malinowski

The Examiner referred to Figure 7 of Malinowski in support of the rejection of the claims under 35 U.S.C. §102. The Examiner labeled several structures on Figure 7 to correspond to the limitations to the pending claims. Based on the explanation above regarding the components of the pending claims, it is evident that some of the structures labeled by the Examiner do not and cannot be or function as some of the comments in the pending claims.

The Examiner identified component 42 of Malinowski as the frame mount assembly. The claims require that the frame mount assembly be mounted to a frame of the vehicle. As the Examiner is aware, the term “frame” is a term of art in the vehicle industry. Component 42 does not and cannot mount to the frame of a vehicle. The Examiner asserted that the Applicants arguments were not persuasive since the component 42 could be mounted to the frame of the bull dozer. The

Examiner asserted that Malinowski teaches that dozer blades and dozer blade units can be mounted to the tractor frame. Although Applicants acknowledge that Malinowski teaches a blade unit that can be removed from the tractor, component 42 cannot be the frame mount assembly as defined in claims 88 and 114.

As set forth above, the frame mount assembly as defined in claims 88 and 114 is designed to be **substantially non-detachably mountable to a frame at a front portion of a vehicle**. The Examiner acknowledges that component 42 of Malinowski is disconnectable from the tractor. Indeed, this is clearly illustrated in Figure 7 of Malinowski. As such, component 42 does not satisfy one limitation of claims 88 and 114. Claims 88 and 114 also require the frame mount assembly to be connected to the frame of the vehicle such that **no portion of the frame mount assembly 1) connects to the front bumper of the vehicle, 2) extends beyond the front bumper, and 3) connects to the sides of the vehicle**. As is clearly evident from Figure 7 of Malinowski, component 42 extends beyond the front end of the tractor. As such, this is the second limitation of the frame mount assembly as defined in claims 88 and 114 that is not satisfied by component 42 of Malinowski.

Claims 88 and 114 also include the limitations that the frame mount assembly includes a connection arrangement that is designed to detachably connect and fully secure the support mount assembly to the frame mount assembly. Claims 88 and 114 require that the frame mount assembly include a plurality of connectors that connect the support mount assembly to the frame mount assembly. Claims 88 and 114 also require the connection arrangement of the frame mount assembly to include at least one engagement arrangement that receives at least a part of a front portion of the support mount assembly and at least partially limits movement of the support mount assembly relative to the frame mount assembly when the support mount assembly is secured by the connection

arrangement. Claims 88 and 114 further require that at least one of the connectors of the connection arrangement is spaced forwardly from the engagement arrangement.

Component 42 of Malinowski, which is defined by the Examiner as being equivalent to the frame mount assembly that is defined in the claims, only includes a single connection point 52 that connects to the support assembly 54 which is substantially non-detachably connected to the side of the tractor. Component 42 of Malinowski does not include separate connectors and an engagement arrangement that are designed to detachably secure the support mount assembly to the frame mount assembly. Component 42 only includes a pair of connectors 52 that engages the support assembly as designated by the Examiner. No other structure of component 42 engages the support assembly. Applicants also note that the frame mount assembly defined in claims 88 and 114 is substantially non-detachably connected to the vehicle and the support mount assembly is disengageably connected to the frame mount assembly. The designation of the support assembly and the frame mount assembly by the Examiner in Figure 7 of Malinowski results in the support assembly being substantially non-detachably connected to the tractor and the frame mount assembly being disengageably connected to the support mount assembly. This arrangement is opposite to and contrary to several limitations in claims 88 and 114.

Claims 88 and 114 also include limitations that require the plow mount assembly to be 1) detachably connected to the support mount assembly at one end and 2) connected to a snowplow blade at the other end. The plow mount assembly designated by the Examiner in Figure 7 of Malinowski does not have one end connectable to the support assembly. The plow mount assembly designated by the Examiner in Figure 7 of Malinowski is connected to the snowplow blade, the lift mount assembly and the frame mount assembly. This arrangement is contrary to several limitations defined in claims 88 and 114, namely **1) the plow mount assembly is connectable to the support**

mount assembly, 2) the plow mount assembly is pivotally connectable to the support mount assembly, and 3) the plow mount assembly is detachably connectable to the support mount assembly in a manner that allows the plow mount assembly to be fully disconnected from the support mount assembly without having to partially or fully disconnect the support mount assembly from the frame mount assembly. The arrangement of Malinowski as set forth above is further distinguished from independent claim 88 since the plow mount assembly of Malinowski is not spaced from and does not engage with the frame mount assembly when the plow mount is connected to the support mount assembly.

Applicants maintain that for any one of the reasons set forth above, pending independent claims 88 and 114 are not anticipated by Malinowski. Applicants further submit that the limitations of dependent claims 89-93, 106, 124 and 133 are not disclosed by Malinowski, thus are not anticipated by Malinowski. Applicants further submit that since the plow blade mount unit disclosed in Malinowski is so different from the snowplow mount assembly defined in independent claims 88 and 114 and in many of the dependent claims, Malinowski cannot make obvious any of the pending claims individually or in combination with any of the cited art of record.

B. The Anticipation Rejection Based on Behrens et al.

The Examiner referred to Figure 1 of Behrens in support of the rejection of the claims under 35 U.S.C. §102. The Examiner labeled several components of the snowplow unit disclosed in Figure 1 of Behrens. Based on the explanation above regarding the components of the pending claims, it is evident that some of the structures labeled by the Examiner do not and cannot be or function as some of the comments in the pending claims.

The Examiner identified component 32 of Behrens as the frame mount assembly. As stated above, the claims require that the frame mount assembly be mounted to a frame of the vehicle.

Component 32 does not and cannot mount to the frame of a vehicle. The Examiner asserted that the Applicant's arguments were not persuasive since the component 32 could be detachably connected to the frame of the vehicle. Applicants submit that component 32 of Behrens cannot be the frame mount assembly as defined in claims 88 and 114.

As previously stated, the frame mount assembly as defined in claims 88 and 114 is designed to be **substantially non-detachably mountable to a frame at a front portion of a vehicle**. The Examiner acknowledges that component 32 of Behrens is disconnectable to the vehicle. Indeed, this is clearly illustrated in Figure 1 of Behrens. As such, component 32 does not satisfy one limitation of claims 88 and 114. Claims 88 and 114 also require the frame mount assembly to be connected to the frame of the vehicle such that **no portion of the frame mount assembly 1) connects to the front bumper of the vehicle, 2) extends beyond the front bumper, and 3) connects to the sides of the vehicle**. As is clearly evident from Figure 1 of Behrens, component 32 extends beyond the front end of the vehicle. As such, this is the second limitation of the frame mount assembly as defined in claims 88 and 114 that is not satisfied by component 32 of Behrens.

Claims 88 and 114 also include the limitations that the frame mount assembly includes a connection arrangement that is designed to detachably connect and fully secure the support mount assembly to the frame mount assembly. Claims 88 and 114 require that the frame mount assembly include a plurality of connectors that connect the support mount assembly to the frame mount assembly. Claims 88 and 114 also require the connection arrangement of the frame mount assembly to include at least one engagement arrangement that receives at least a part of a front portion of the support mount assembly and at least partially limits movement of the support mount assembly relative to the frame mount assembly when the support mount assembly is secured by the connection arrangement. Claims 88 and 114 further require that at least one of the connectors of the connection

arrangement is spaced forwardly from the engagement arrangement.

Component 32 of Behrens, which is defined by the Examiner as being equivalent to the frame mount assembly that is defined in the claims, only includes a single connection point 42 that connects to the support assembly 26 which is substantially non-detachably connected to the side of the vehicle. Component 32 of Behrens does not include separate connectors and an engagement arrangement that are designed to detachably secure the support mount assembly to the frame mount assembly. Component 32 only includes a pair of connectors 42 that engage the support assembly as designated by the Examiner. No other structure of component 32 engages the support assembly. Applicants also note that the frame mount assembly defined in claims 88 and 114 is substantially non-detachably connected to the vehicle and the support mount assembly is disengageably connected to the frame mount assembly. The designation of the support assembly and the frame mount assembly by the Examiner in Figure 1 of Behrens results in the support assembly being substantially non-detachably connected to the vehicle and the frame mount assembly being disengageably connected to the support mount assembly. This arrangement is opposite to and contrary to several limitations in claims 88 and 114.

Claims 88 and 114 also include limitations that require the plow mount assembly to be 1) detachably connected to the support mount assembly at one end and 2) connected to a snowplow blade at the other end. The plow mount assembly designated by the Examiner in Figure 1 of Behrens does not have one end connectable to the support assembly. The plow mount assembly designated by the Examiner in Figure 1 of Behrens is connected to the snowplow blade, the lift mount assembly and the frame mount assembly. This arrangement is contrary to several limitations defined in claims 88 and 114, namely **1) the plow mount assembly is connectable to the support mount assembly, 2) the plow mount assembly is pivotally connectable to the support mount**

assembly, and 3) the plow mount assembly is detachably connectable to the support mount assembly in a manner that allows the plow mount assembly to be fully disconnected from the support mount assembly without having to partially or fully disconnect the support mount assembly from the frame mount assembly. The arrangement of Behrens as set forth above is further distinguished from independent claim 88 since the plow mount assembly of Behrens is not spaced from and does not engage with the frame mount assembly when the plow mount is connected to the support mount assembly.

Applicants maintain that for any one of the reasons set forth above, pending independent claims 88 and 114 are not anticipated by Behrens. Applicants further submit that the limitations of dependent claims 89-93, 107, 108, 124 and 133 are not disclosed by Behrens, thus are not anticipated by Malinowski. Applicants further submit that since the plow blade mount unit disclosed in Malinowski is so different from the snowplow mount assembly defined in independent claims 88 and 114 and in many of the dependent claims, Behrens cannot make obvious any of the pending claims individually or in combination with any of the cited art of record.

III. THE SECTION 103 REJECTIONS

Claims 121, 122, 125, 127, 128, 134 and 135 were rejected under 35 U.S.C. §103(a) as being unpatentable over Malinowski. Claims 121, 122, 125, 127, 128, 134, 135, 141 and 144 were rejected under 35 U.S.C. §103(a) as being unpatentable over Behrens. Claims 109 and 139 under 35 U.S.C. §103(a) as being unpatentable over Malinowski in view of Pieper. Claim 110 was rejected under 35 U.S.C. §103(a) as being unpatentable over Malinowski in view of Willis. Claims 109, 139, 142, 143 and 145 were rejected under 35 U.S.C. §103(a) as being unpatentable over Behrens in view of Pieper. Finally, claims 110, 111 and 113 were rejected under 35 U.S.C. §103(a) as being unpatentable over Behrens in view of Willis.

A. The Obviousness Rejection Based on Malinowski

As set forth above, the structure of the plow blade unit disclosed in Malinowski is very different from the components of the snowplow mount assembly defined in claims 88 and 114. Applicants resubmit that independent claims 88 and 114 are not anticipated or made obvious in view of Malinowski. For at least this reason, dependent claims 121, 122, 125, 127, 128, 134 and 135 are not obvious in view of Malinowski.

The Examiner stated that official notice was taken regarding the use of removable pins and pin clips. Applicants admit that pins and pin clips are not new; however, Applicants submit that the pins and/or pin clips defined in claims 121, 122, 125, 127 and 128 in combination with the structural limitations in the claims that such claims depend therefrom, result in the patentability of such claims in view of Malinowski. For at least these additional reasons, claims 121, 122, 125, 127 and 128 are not obvious in view of Malinowski.

Claims 134 and 135 include the limitation that the connection arrangement of the frame mount assembly includes at least two engagement arrangements, and that each engagement arrangement is designed to at least partially telescopically receive at least a portion of the support mount assembly. As set forth above, component 42 of Malinowski, which is designated by the Examiner as the frame mount assembly of Malinowski, does not include any structure that could function as the engagement arrangement defined in independent claims 88 and 114. Indeed, component 42 of Malinowski does not include both a plurality of connectors and an engagement arrangement. In addition, component 42 of Malinowski does not disclose, teach or suggest the additional structure of the engagement arrangement defined in claims 134 and 135. Indeed, there is no structure on component 42 of Malinowski that telescopically receives any portion of component 54, which is designated by the Examiner as the support assembly of Malinowski. For

at least these additional reasons, claims 134 and 135 are not obvious in view of Malinowski.

B. The Obviousness Rejection Based on Behrens

As set forth above, the structure of the snowplow blade unit disclosed in Behrens is very different from the components of the snowplow mount assembly defined in claims 88 and 114. Applicants resubmit that independent claims 88 and 114 are not anticipated or made obvious in view of Behrens. For at least this reason, dependent claims 121, 122, 125, 127, 128, 134, 135, 141 and 144 are not obvious in view of Behrens.

The Examiner stated that official notice was taken regarding the use of removable pins and pin clips. Applicants admit that pins and pin clips are not new; however, Applicants submit that the pins and/or pin clips defined in claims 121, 122, 125, 127 and 128 in combination with the structural limitations in the claims that such claims depend therefrom, result in the patentability of such claims. For at least these additional reasons, claims 121, 122, 125, 127 and 128 are not obvious in view of Behrens.

Claims 134 and 135 include the limitation that the connection arrangement of the frame mount assembly includes at least two engagement arrangements, and that each engagement arrangement is designed to at least partially telescopically receive at least a portion of the support mount assembly. As set forth above, component 32 of Behrens, which is designated by the Examiner as the frame mount assembly of Behrens, does not include any structure that could function as the engagement arrangement defined in independent claims 88 and 114. Indeed, component 32 of Behrens does not include both a plurality of connectors and an engagement arrangement. In addition, component 32 of Behrens does not disclose, teach or suggest the additional structure of the engagement arrangement defined in claims 134 and 135. Indeed, there is no structure on component 32 of Behrens that telescopically receives any portion of component

26, which is designated by the Examiner as the support assembly of Behrens. For at least these additional reasons, claims 134 and 135 are not obvious in view of Behrens.

Claim 144 requires that the plow mount assembly be spaced forwardly from and not engaged with the frame mount assembly when the support mount assembly is pivotally connected to the frame mount assembly. As illustrated in Figure 1 of Behrens, one end of component 32, which is designated by the Examiner as the frame mount assembly, directly connects to the plow mount assembly. Applicants submit that the teaching and disclosure of Behrens is directly contract to the limitation set forth in claim 144. For at least this additional reason, claim 144 is not obvious in view of Behrens.

C. The Obviousness Rejection Based on Malinowski and Pieper

As set forth above, the structure of the plow blade unit disclosed in Malinowski is very different from the components of the snowplow mount assembly defined in claims 88 and 114. Applicant resubmit that independent claims 88 and 114 are not anticipated or made obvious in view of Malinowski. For at least this reason, dependent claims 109 and 139 are not obvious in view of Malinowski alone or in combination with Pieper.

Pieper discloses a plow mount assembly that includes an A-frame 42 (plow mount assembly), a lift frame 44 (support mount assembly) and mount frame 28 (frame mount assembly). The A-frame 42 is pivotally connected to the lift frame by pin 86. Pin 86 is also used to connect the lift frame and the A-frame to the mount frame. As discussed above, this connection arrangement is directly contrary to the structure of the plow mount assembly defined in claim 88 which requires the plow mount assembly to be spaced from, and to not engage the frame mount assembly when connected to the support mount assembly. In addition, the A-frame of Pieper cannot be disconnected from the lift frame prior to the lift frame being fully or partially disconnected from the mount frame.

This arrangement of Pieper is also directly contrary to the structure of the plow mount assembly defined in claims 88 and 114 which requires the plow mount assembly to be detachably connectable to the support mount assembly to enable the plow mount assembly to be disengaged from the vehicle without having to partially or fully disconnect the support mount assembly from the frame mount assembly.

Pieper also discloses and teaches that plate 36 of the frame mount is partially secured to the side of bumper 24 as shown in Figure 1. This arrangement is contrary to the structure of the frame mount assembly defined in claims 88 and 114 wherein no portion of the frame mount assembly connects to the front bumper of the vehicle or connects to the sides of the vehicle.

For at least these additional reasons, Pieper in combination with Malinowski do not make obvious any of the claims pending in the present invention.

D. The Obviousness Rejection Based on Behrens and Pieper

As set forth above, the structure of the plow blade unit disclosed in Behrens is very different from the components of the snowplow mount assembly defined in claims 88 and 114. Applicants resubmit that independent claims 88 and 114 are not anticipated or made obvious in view of Behrens. For at least this reason, dependent claims 109, 139, 142, 143 and 145 are not obvious in view of Behrens alone or in combination with Pieper.

As set forth above, Pieper discloses connection arrangement for the plow mount assembly and the frame mount assembly that is contrary to the snowplow mount assembly defined in claims 88 and 114. For at least this additional reason, Pieper in combination with Behrens do not make obvious any of the claims pending in the present invention.

Claim 145 further includes the limitation that the plow mount assembly is spaced from and does not engage with the frame assembly when the support mount assembly is pivotally connected

to the frame mount assembly and the plow mount assembly is connected to the support mount assembly. As set forth above, Pieper discloses that one end of the A-frame connects to both the lower support 54 (support mount assembly) and the mount frame 28 (frame mount assembly) by pin 86. For at least this further reason, dependent claim 145 is not obvious in view of Behrens alone or in combination with Pieper.

E. The Obviousness Rejection Based on Behrens and Willis

As set forth above, the structure of the plow blade unit disclosed in Behrens is very different from the components of the snowplow mount assembly defined in claims 88 and 114. Applicants resubmit that independent claims 88 and 114 are not anticipated or made obvious in view of Behrens. For at least this reason, dependent claims 110, 111 and 113 are not obvious in view of Behrens alone or in combination with Willis.

Willis was cited in combination with Behrens as teaching features associated with a snowplow blade. As discussed above, Behrens does not disclose or teach the structural limitations of a snowplow blade mount as defined in the claims. Willis is absent any teaching with respect to a frame mount assembly, a support mount assembly or a plow mount assembly as defined in the pending claims. As such, Willis in combination with Behrens cannot make obvious any of the pending claims. For at least this additional reason, dependent claims 110, 111 and 113 are not obvious in view of Behrens in combination with Willis.

F. The Obviousness Rejection Based on Malinowski and Willis

As set forth above, the structure of the plow blade unit disclosed in Malinowski is very different from the components of the snowplow mount assembly defined in claims 88 and 114. Applicants resubmit that independent claims 88 and 114 are not anticipated or made obvious in view of Malinowski. For at least this reason, dependent claim 110 is not obvious in view of Malinowski

alone or in combination with Willis.

As set forth above, Willis was cited as teaching features associated with a snowplow blade. As discussed above, Malinowski does not disclose or teach the structural limitations of a snowplow blade mount as defined in the claims and Willis is absent any teaching with respect to a frame mount assembly, a support mount assembly or a plow mount assembly as defined in the pending claims. As such, Willis in combination with Malinowski cannot make obvious any of the pending claims. For at least this additional reason, dependent claim 110 is not obvious in view of Malinowski in combination with Willis.

IV. CONCLUSION

Applicants submit that the claims presently pending in the above-identified patent application are in condition for allowance and a notice to that effect is earnestly solicited.

Respectfully submitted,
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